

Presentment Date: December 3, 2014 at 12:00 p.m. (Eastern Time)  
Objection Deadline: December 3, 2014 at 11:30 a.m. (Eastern Time)

**LOWENSTEIN SANDLER LLP**

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*Counsel to the Debtor and Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

New York City Opera, Inc.

Debtor.

Chapter 11

Case No. 13-13240 (SHL)

**NOTICE OF PRESENTMENT OF STIPULATED ORDER  
EXTENDING TIME FOR GEORGE STEEL TO (A) FILE PROOF OF  
CLAIM UNTIL JANUARY 28, 2015, AND (B) TO FILE CLAIM FOR  
REJECTION OF EXECUTORY CONTRACT UNTIL JANUARY 28, 2015**

**PLEASE TAKE NOTICE** that New York City Opera, Inc., the above-captioned debtor and debtor in possession (“**NYC Opera**” or the “**Debtor**”), by and through its undersigned counsel, will present the *Stipulated Order Extending Time for George Steel to (A) File Proof of Claim Until January 28, 2015, and (B) File Claim for Rejection of Executory Contract Until January 28, 2015* attached hereto as **Exhibit A** (the “**Stipulated Order**”) to the Honorable Sean H. Lane, United States Bankruptcy Judge, for signature and approval, at Room 701 of the United States Bankruptcy Court for the Southern District of New York (“**Bankruptcy**

**Court**”), Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, on **December 3, 2014 at 12:00 noon (Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Stipulated Order must: (i) be in writing; (ii) state the name and address of the responding party and the amount and nature of the claim or interest of such party; (iii) state with particularity the legal and factual basis of any response; (iv) conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York; and (v) be filed with the Bankruptcy Court, together with proof of service, electronically, in accordance with General Order M-399 (General Order M-399 and the User’s Manual for the Electronic Case Filing System which can be found at the Bankruptcy Court’s official website ([www.nysb.uscourts.gov](http://www.nysb.uscourts.gov))), by registered users of the Bankruptcy Court’s case filing system and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format (with a hard copy delivered to Chambers) and served in accordance with General Order M-399, so as to be *actually received* not later than **11:30 a.m. (Eastern Time) on December 3, 2014** (the “**Objection Deadline**”) and, such service shall be completed and actually received by the following parties on or prior to the Objection Deadline: (i) counsel to the Debtor, Lowenstein Sandler LLP, Attn: Kenneth A. Rosen, Esq. and Nicole Stefanelli, Esq., 65 Livingston Avenue, Roseland, NJ 07068 and (ii) Counsel to George Steel, Weinstein, Pinson & Riley, P.S., Attn: Susan Power Johnston, 1023 Old White Plains Road, Mamaroneck, NY 10543-1100.

**PLEASE TAKE FURTHER NOTICE** that, unless an objection is timely served and filed on or before the Objection Deadline, the Stipulated Order may be approved and signed without further notice or a hearing by the Bankruptcy Court.

**PLEASE TAKE FURTHER NOTICE** if a written objection is timely served and filed, the Bankruptcy Court will schedule a hearing to consider the Stipulated Order before the Honorable Sean H. Lane, United States Bankruptcy Judge, at Room 701 of the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, notice of which will be provided by undersigned

counsel to each such objecting party(s). The objecting party(s) are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted upon default.

**PLEASE TAKE FURTHER NOTICE** that any such hearing may be adjourned without further notice other than by announcement of such adjournment in the Bankruptcy Court on the date scheduled for such hearing or for any such adjourned hearing.

Respectfully submitted,

Dated: November 26, 2014

**LOWENSTEIN SANDLER LLP**

/s/ Nicole Stefanelli

Kenneth A. Rosen

Nicole Stefanelli

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**Exhibit A**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

New York City Opera, Inc.

Debtor.

Chapter 11

Case No. 13-13240 (SHL)

**STIPULATED ORDER EXTENDING TIME FOR GEORGE STEEL TO (A) FILE  
PROOF OF CLAIM UNTIL JANUARY 28, 2015, AND (B) TO FILE CLAIM FOR  
REJECTION OF EXECUTORY CONTRACT UNTIL JANUARY 28, 2015**

**WHEREAS**, on October 3, 2013 (the “**Petition Date**”), New York City Opera, Inc., the above-captioned debtor and debtor in possession (“**NYC Opera**” or the “**Debtor**”) filed a voluntary petition for relief (the “**Chapter 11 Case**”) under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”);

**WHEREAS**, on February 5, 2014, this Court entered the *Order Establishing Bar Dates for Filing Proofs of Claim and Approving the Form and Manner of Notice Thereof* [Docket No. 119] (the “**Bar Date Order**”);

**WHEREAS**, the Bar Date Order established March 17, 2014 at 5:00 p.m. (prevailing Eastern Time) as the date by which all persons and entities (excluding governmental units as defined by section 101(27) of the Bankruptcy Code) holding a claim or interest against the Debtor that arose or is deemed to have arisen prior to the Petition Date must file a proof of claim or interest;

**WHEREAS**, on March 14, 2014, the Court entered the *Stipulated Order Extending Time for George Steel to File Proof of Claim Until June 17, 2014* (the “**Bar Date Extension Order**”) [Docket No. 145];

**WHEREAS**, on May 21, 2014, this Court entered the *Order Granting Debtor’s First Omnibus Motion For An Order Authorizing the Rejection of Certain Executory Contracts*

*Nunc Pro Tunc to the Petition Date* [Docket No. 163] (the “**First Executory Contract Rejection Order**”);

**WHEREAS**, the First Executory Contract Rejection Order established June 20, 2014, at 5:00 p.m. (prevailing Eastern Time) as the date by which counterparties to the contracts rejected pursuant to the order must file rejection damages claims pursuant to section 502 of the Bankruptcy Code in connection with the rejection or termination of the contracts;

**WHEREAS**, George Steel, the former Chief Executive Officer, General Manager and Artistic Director of the New York City Opera (“**Steel**”), seeks to assert claims against the Debtor arising from his employment by the Debtor prior to the Petition Date

**WHEREAS**, one of the contracts rejected pursuant to the First Executory Contract Rejection Order was the General Manager and Artistic Director Contract between Steel the NYC Opera (the “**Contract**”);

**WHEREAS**, Steel may wish to assert a rejection damages claim against the Debtor arising from rejection of the Contract (a “**Rejection Damages Claim**”);

**WHEREAS**, the Debtor has agreed to three prior extensions of time within which Steel must file a Proof of Claim and/or a Rejection Damages Claim, the most recent of which will expire on November 28, 2014, at 5:00 p.m. (prevailing Eastern Time);

**WHEREAS**, the Debtor has agreed to further extend the time within which Steel must file a Proof of Claim and/or a Rejection Damages Claim until January 28, 2015 at 5:00 p.m. (prevailing Eastern Time);

**WHEREAS**, the Debtor and Steel, through their respective counsel, hereby stipulate to and submit the following Stipulated Order for the Court’s approval.

**NOW THEREFORE, IT IS HEREBY ORDERED** as follows:

1. The time within which Steel must file a Claim be and it hereby is extended until January 28, 2015, at 5:00 p.m. (prevailing Eastern Time);
2. The time within which Steel must file a Rejection Damages Claim in this case be and it hereby is extended until January 28, 2015 at 5:00 p.m. (prevailing Eastern Time).

3. This Stipulated Order is without prejudice to further mutually agreed extensions.

4. The terms and conditions of this Stipulated Order shall be immediately effective and enforceable upon its entry.

5. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Stipulated Order.

**STIPULATED AND AGREED:**

Dated: November 26, 2014

**LOWENSTEIN SANDLER LLP**

/s/ Nicole Stefanelli

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*Counsel to Debtor and Debtor in Possession*

**WEINSTEIN, PINSON & RILEY, P.S.**

/s/ Susan Power Johnston

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*Counsel to George Steel*

**SO ORDERED:**

Dated: \_\_\_\_\_, 2014  
New York, New York

\_\_\_\_\_  
HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE